

5-21-2019

949339

**From:** Wagner, William

**Sent:** Tuesday, May 21, 2019 10:48 AM

**To:** Belke, Jim <Belke.Jim@epa.gov>

**Cc:** Mayhugh, Robert <mayhugh.robert@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>; Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>; Miles, James <miles.james@epa.gov>; Hans, Mick <hans.mick@epa.gov>; Chrzaszcz, Monika <chrzaszcz.monika@epa.gov>; Marshall, Sarah <marshall.sarah@epa.gov>; Kyte, Larry <kyte.larry@epa.gov>

**Subject:** RE: talking point for refinery incidents

Yes, Jim, that is a correct characterization. We have requested, received, and reviewed information; however, we are waiting for the CSB report prior to initiating further requests or inspections.  
Bill

5-2-2019

## Non-Responsive

**From:** Hans, Mick <hans.mick@epa.gov>  
**Sent:** Thursday, May 02, 2019 12:03 PM  
**To:** Belke, Jim <Belke.Jim@epa.gov>  
**Cc:** Haas, Craig <Haas.Craig@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Subject:** RE: Husky Superior?

Hi Jim,

Husky's regulated process has not yet been re-started—so not yet. Craig and Bob Mayhugh have been involved in the substantial discussions with the facility.

If need details, let's get them in the conversation. (Bob and I are trading messages at the moment, so he is working today.)

Mick

---

**From:** Belke, Jim  
**Sent:** Thursday, May 02, 2019 11:53 AM  
**To:** Hans, Mick <hans.mick@epa.gov>  
**Cc:** Haas, Craig <Haas.Craig@epa.gov>  
**Subject:** Husky Superior?

Hi Mick – just checking in on this – has R5 done an inspection yet at this refinery? I am asking because we just received a letter from CSB (attached) that was ultimately triggered by the Husky accident.

Thanks,

Jim Belke

10-12-2018

## Non-Responsive

**From:** Mayhugh, Robert  
**Sent:** Friday, October 12, 2018 8:36 AM  
**To:** Wagner, William <wagner.william@epa.gov>  
**Subject:** Fw: Re: Husky/Superior Meeting and ORC Assignment

Mick's first sentence is the reason that I think the call will be dealing primarily with the ARD case.

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**From:** Hans, Mick  
**Sent:** Friday, October 5, 2018 11:16 AM  
**To:** El-Zein, Jason  
**Cc:** Mankowski, Matthew; Mayhugh, Robert  
**Subject:** RE: Re: Husky/Superior Meeting and ORC Assignment

I think the meeting will focus on resolution of an ongoing ARD matter, but CAA 112r should be present as it has been high-profile.

CAA 112r plans to inspect when the relevant processes are up and running again. HQ OEM will provide an expert inspector and/or contractor resources when CEPPS visits the site. I imagine we'll at least confirm they can expect an inspection at this meeting. Possibly the CAA 112r inspection might be coordinated with CWA 311 (OSC Morrison?) or RCRA too.

Bob, anything to add that Doug and Jason should have on their radar?

Mick

---

**From:** El-Zein, Jason  
**Sent:** Friday, October 05, 2018 11:08 AM  
**To:** Hans, Mick <hans.mick@epa.gov>  
**Cc:** Mankowski, Matthew <mankowski.matthew@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Subject:** RE: Re: Husky/Superior Meeting and ORC Assignment

Mick, I should have read this message first. Thanks.

---

**From:** Hans, Mick

**Sent:** Friday, October 05, 2018 10:51 AM

**To:** Toney, Marcy <[toney.marcy@epa.gov](mailto:toney.marcy@epa.gov)>; Zander, Rachel <[Zander.Rachel@epa.gov](mailto:Zander.Rachel@epa.gov)>; Mayhugh, Robert <[mayhugh.robert@epa.gov](mailto:mayhugh.robert@epa.gov)>; Haas, Craig <[Haas.Craig@epa.gov](mailto:Haas.Craig@epa.gov)>

**Cc:** Chomycia, Greg <[chomycia.greg@epa.gov](mailto:chomycia.greg@epa.gov)>; El-Zein, Jason <[el-zein.jason@epa.gov](mailto:el-zein.jason@epa.gov)>; Mankowski, Matthew <[mankowski.matthew@epa.gov](mailto:mankowski.matthew@epa.gov)>; Wagner, William <[wagner.william@epa.gov](mailto:wagner.william@epa.gov)>

**Subject:** Re: Husky/Superior Meeting and ORC Assignment

Marcy and Rachel,

Thanks for the call about a meeting with Husky's Sidley & Austin representatives in late October. Yes, Bob Mayhugh is CAA 112r lead for Wisconsin and this matter. Craig Haas at HQ OECA is also monitoring and may participate in an inspection or provide contractor resources. Greg Chomycia is lead for MN, where we've had media interest in both Husky and the St. Louis Park Refinery RMP. Greg will keep an ear to this and act as Bob's backup, possibly joining the meeting.

Bob will request an ORC for the case. Looping CAA 112r-lead ORC Bill Wagner too.

OSC Dave Morrison is on the ground in the Twin Cities. He and Kristina Behnke, who worked the ER, are also available.

I'll be at the Annual CEPPPO meeting in R10 the week of Oct 22-26. I could arrange for Matt or Jason to cover for me, if appropriate. Craig and I could also possibly call-in.

Mick Hans

Chief, Chemical Emergency Preparedness and Prevention

Emergency Response Branch #1

Superfund Division

U.S. EPA Region 5

77 W. Jackson Blvd. (SC-5J)

Chicago, IL 60604

312 353-5050

# Non-Responsive

**From:** Mayhugh, Robert  
**Sent:** Tuesday, August 13, 2019 2:17 PM  
**To:** Wagner, William  
**Subject:** FW: Write up

4-26-18  
10:13 pm

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**From:** Mayhugh, Robert  
**Sent:** Thursday, April 26, 2018 10:13 PM  
**To:** Hans, Mick <hans.mick@epa.gov>  
**Subject:** Write up

At approximately 10:00 am on Thursday April 26th an explosion occurred at Husky Refinery in Superior, Wisconsin. Husky was initiating a turn around when the incident took place. Initial reports claimed that 20 individuals were injured with the possibility of fatalities. These numbers were later reduced to 5 injured and no fatalities. By 11:20 pm the initial fire was extinguished and first responders believed that the incident was under control. However, by approximately 12:00 pm a second series of explosions occurred. At this point the fire department went into defensive mode to protect the near by tanks as well as the hydrogen fluoride (HF) that is also present on site. Because of the presence of HF, which is an extremely toxic substance, the city of Superior and Douglas County decided to evacuate an area 10 miles south, 3 miles both east and west, and 1 mile north of the refinery. The City of Duluth, Minnesota and surrounding areas in Minnesota, opted to shelter in place as they are a reasonable distance from the facility. By approximately 7:30 pm the fire was extinguished and the Mayor of Superior stated that the evacuation order would be lifted in approximately 2 hours or 9:30 pm.

During the event, CEPPS staff was in contact with the Wisconsin Emergency Management Duty Officer and received updates and other information regarding the incident. Staff was also in contact with the Wisconsin Department of Military Affairs Planning Supervisor. Through these conversations it was determined that the facility had made all of the required notifications as required by the Emergency Planning and Community Right-to-Know Act. Further contact with both agencies will take place in the upcoming days.

Contrary to published reports, the facility submitted their RMP in May of 2017. An RMP inspection was scheduled for the week of 4/16, however was postponed due to the upcoming turnaround. CEPPS is currently in discussions with HQ to visit the site at some point in the future to examine their RMP and possibly check for General Duty Clause violations.

At the time of the response, the Chemical Safety Board was en route to the incident. The CSB will assist in determining the cause of the initial and secondary explosions.

4.26.18 1:05 pm

# Non-Responsive

**From:** Mayhugh, Robert  
**Sent:** Thursday, April 26, 2018 1:05 PM  
**To:** Belke, Jim  
**Subject:** Re: Explosion at an oil refinery

We were supposed to go out with NEIC last week. However we cancelled because they are in a turn around.

---

**From:** Belke, Jim  
**Sent:** Thursday, April 26, 2018 11:47:32 AM  
**To:** Hans, Mick; Mayhugh, Robert  
**Cc:** Chomycia, Greg; Haas, Craig  
**Subject:** FW: Explosion at an oil refinery

Folks – we are getting questions on this incident. Can you tell us when the facility was last inspected, and any issues that came out of the inspection?

Thanks,  
Jim

---

**From:** Jennings, Kim  
**Sent:** Thursday, April 26, 2018 12:43 PM  
**To:** Belke, Jim <Belke.Jim@epa.gov>  
**Cc:** Franklin, Kathy <Franklin.Kathy@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>  
**Subject:** FW: Explosion at an oil refinery

Hi Jim,  
Can you get the RMP for this facility and info on when it was last inspected, etc.  
Thanks,  
Kim  
Kim Jennings

Division Director || Regulations Implementation Division  
U.S. Environmental Protection Agency || Office of Emergency Management  
E-mail: [jennings.kim@epa.gov](mailto:jennings.kim@epa.gov) || Desk: (202) 564-7998 ||

---

**From:** Jennings, Kim  
**Sent:** Thursday, April 26, 2018 12:35 PM  
**To:** OLEM OEM RID <[OLEM\\_OEM\\_RID@epa.gov](mailto:OLEM_OEM_RID@epa.gov)>  
**Cc:** OLEM OEM Managers <[OLEMOEMManagers@epa.gov](mailto:OLEMOEMManagers@epa.gov)>  
**Subject:** RE: Explosion at an oil refinery

Here is a recent news article:

## At least 20 hurt in Superior refinery explosion

SUPERIOR, WI (WDIO) - The Superior Fire Department reports at least 20 people with injuries after an explosion at the Husky oil refinery.

The explosion happened at about 10:06 a.m. at the refinery.

A contractor who was inside the building told ABC affiliate WDIO it sounded like "a sonic boom." He said crews were working on shutting the plant down for repairs. According to the contractor, that is one of the most dangerous times.

Superior Police sent a message on Twitter asking people to stay away from the area.

Road are blocked off around the refinery and employees have been evacuated.

The Superior School District sent a message to parents saying "at this time, there is no reason to evacuate any of the school buildings. We will be keeping all students in the buildings." An employee from the Superior Bank of Commerce said they could feel some sort of explosion.

Husky purchased the refinery last year from Calumet last year. The Duluth News Tribune reported at that time that the refinery, which is the only one in Wisconsin, had about 180 employees.

Kim Jennings

**Division Director || Regulations Implementation Division**

**U.S. Environmental Protection Agency || Office of Emergency Management**

**E-mail: [jennings.kim@epa.gov](mailto:jennings.kim@epa.gov) || Desk: (202) 564-7998 ||**

**From: Jennings, Kim**

**Sent: Thursday, April 26, 2018 12:30 PM**

**To: OLEM OEM RID <[OLEM\\_OEM\\_RID@epa.gov](mailto:OLEM_OEM_RID@epa.gov)>**

**Cc: OLEM OEM Managers <[OLEMOEMManagers@epa.gov](mailto:OLEMOEMManagers@epa.gov)>**

**Subject: Explosion at an oil refinery**

Hi all,

I just got a message that there was an explosion at the Husky Energy oil refinery in Superior, Wisconsin. The report said there are at least 20 casualties.

I will keep checking on updates.

Thanks,

Kim

Kim Jennings

**Division Director || Regulations Implementation Division**

**U.S. Environmental Protection Agency || Office of Emergency Management**

**E-mail: [jennings.kim@epa.gov](mailto:jennings.kim@epa.gov) || Desk: (202) 564-7998 ||**

4-26-2018 12:23 pm

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Thursday, April 26, 2018 12:23 PM  
**To:** Borries, Samuel; Ballotti, Doug; Short, Thomas  
**Cc:** El-Zein, Jason; Mankowski, Matthew; Wagner, William; Kyte, Larry; Bumba, Lauren; Fisseha, Ashley; Kelley, Jeff; Mayhugh, Robert; Chomycia, Greg; Riley, Ellen; Walts, Alan; Anderson, Andrew; Miller, Kristina; Haag, Daniel  
**Subject:** CEPPS re: FW: Explosion at an oil refinery SUPERIOR WI

CEPPS is gathering information. I haven't connected with ERB yet. (I just saw there's an e-mail from Kristina Miller, cc'd.)

Per below, we had rescheduled an inspection with NEIC at this facility in the last two weeks—and postponed it when NEIC learned it was in turnaround. We had identified it as a complex process facility and lined up NEIC for a thorough inspection.

The CAA 112r program has never inspected it before. R5 has the largest portfolio of CAA 112r facilities in the U.S. There are a number of facilities we have not yet inspected since the program was established.

There will be much to sort through in the days to come. At this early moment, safety of those who work there, first responders and live nearby is the first priority. R5 CEPPS will investigate for potential enforcement action/RMP Plan review/inspection depending on conditions as soon as practicable. In the last several days, Bob Mayhugh (CAA 112r lead for Wisconsin) and Craig Haas at HQ OECA had begun discussing bringing ERG (the HQ refinery consultant) into this rescheduled NEIC inspection. Likely, that plan will accelerate now.

## Non-Responsive

Bob and I are both AWL today—I was planning on a short day, but we'll see how it goes. My cell: Non-Responsive Checking my voicemail too.

Mick

---

**From:** Kelley, Jeff  
**Sent:** Thursday, April 26, 2018 11:56 AM  
**To:** Hans, Mick <hans.mick@epa.gov>  
**Cc:** Rowan, Anne <rowan.anne@epa.gov>; Bassler, Rachel <Bassler.Rachel@epa.gov>; Singer, Joshua <Singer.Joshua@epa.gov>  
**Subject:** Re: Explosion at an oil refinery SUPERIOR WI

Thanks, we've already notified HQ public affairs and the RA.

-----  
**Jeff Kelley**  
Director, Office of External Communications  
U.S. EPA Region 5  
ph: 312-353-1159

On Apr 26, 2018, at 11:54 AM, Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)> wrote:

FYI. We're gathering information and aware of the situation. I'm AWL and about to synch up with Matt Mankowski and/or Sam Borries. (Jason's off this week.)

We had been in the midst of planning a CAA 112r (Risk Management Program) inspection at this facility.

Mick

---

**From:** Hans, Mick

**Sent:** Thursday, April 26, 2018 11:50 AM

**To:** Jennings, Kim <[Jennings.Kim@epa.gov](mailto:Jennings.Kim@epa.gov)>

**Cc:** Mayhugh, Robert <[mayhugh.robert@epa.gov](mailto:mayhugh.robert@epa.gov)>; Mankowski, Matthew <[mankowski.matthew@epa.gov](mailto:mankowski.matthew@epa.gov)>; El-Zein, Jason <[el-zein.jason@epa.gov](mailto:el-zein.jason@epa.gov)>; Belke, Jim <[Belke.Jim@epa.gov](mailto:Belke.Jim@epa.gov)>; Chomycia, Greg <[chomycia.greg@epa.gov](mailto:chomycia.greg@epa.gov)>; Haas, Craig <[Haas.Craig@epa.gov](mailto:Haas.Craig@epa.gov)>; Tekrony, Linda <[Tekrony.Linda@epa.gov](mailto:Tekrony.Linda@epa.gov)>

**Subject:** RE: Explosion at an oil refinery SUPERIOR WI

Just saw a moment earlier.

Bob Mayhugh was going to join NEIC for an inspection there last week, but it was postponed due to the facility being in turnaround. Which may be a factor here, but I have no information thus far. We had just begun discussing the rescheduling (cc: Linda Tekrony at NEIC).

I'm working AWL today, so need to make some calls to see what our NRC/Emergency Response engagement is.

Greg/Bob, have we ever inspected this facility? Thanks.

Mick Hans  
R5 SFD-ERB1-CEPPS

---

**From:** Jennings, Kim

**Sent:** Thursday, April 26, 2018 11:39 AM

**To:** Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)>

**Subject:** FW: Explosion at an oil refinery

Hi Mick,

FYI, but I am sure you have heard....

Kim

Kim Jennings

Division Director || Regulations Implementation Division

U.S. Environmental Protection Agency || Office of Emergency Management

E-mail: [jennings.kim@epa.gov](mailto:jennings.kim@epa.gov) || Desk: (202) 564-7998 ||

**From:** Jennings, Kim  
**Sent:** Thursday, April 26, 2018 12:35 PM  
**To:** OLEM OEM RID <OLEM\_OEM\_RID@epa.gov>  
**Cc:** OLEM OEM Managers <OLEMOEMManagers@epa.gov>  
**Subject:** RE: Explosion at an oil refinery

Here is a recent news article:

### **At least 20 hurt in Superior refinery explosion**

SUPERIOR, WI (WDIO) - The Superior Fire Department reports at least 20 people with injuries after an explosion at the Husky oil refinery.

The explosion happened at about 10:06 a.m. at the refinery.

A contractor who was inside the building told ABC affiliate WDIO it sounded like "a sonic boom." He said crews were working on shutting the plant down for repairs. According to the contractor, that is one of the most dangerous times.

Superior Police sent a message on Twitter asking people to stay away from the area.

Road are blocked off around the refinery and employees have been evacuated.

The Superior School District sent a message to parents saying "at this time, there is no reason to evacuate any of the school buildings. We will be keeping all students in the buildings." An employee from the Superior Bank of Commerce said they could feel some sort of explosion.

Husky purchased the refinery last year from Calumet last year. The Duluth News Tribune reported at that time that the refinery, which is the only one in Wisconsin, had about 180 employees.

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4.26.18 11:46 am

## Non-Responsive

**From:** Haas, Craig  
**Sent:** Thursday, April 26, 2018 11:46 AM  
**To:** Tekrony, Linda  
**Cc:** Mayhugh, Robert  
**Subject:** FW: Explosion at an oil refinery

Linda, is this the refinery you were planning on inspecting?

---

**From:** Jennings, Kim  
**Sent:** Thursday, April 26, 2018 12:43  
**To:** Belke, Jim <Belke.Jim@epa.gov>  
**Cc:** Franklin, Kathy <Franklin.Kathy@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>  
**Subject:** FW: Explosion at an oil refinery

Hi Jim,

Can you get the RMP for this facility and info on when it was last inspected, etc.

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Kim

Kim Jennings  
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Husky purchased the refinery last year from Calumet last year. The Duluth News Tribune reported at that time that the refinery, which is the only one in Wisconsin, had about 180 employees.

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**Sent:** Thursday, April 26, 2018 12:30 PM  
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**Cc:** OLEM OEM Managers <[OLEMOEMManagers@epa.gov](mailto:OLEMOEMManagers@epa.gov)>  
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I will keep checking on updates.

Thanks,  
Kim

Kim Jennings  
Division Director || Regulations Implementation Division  
U.S. Environmental Protection Agency || Office of Emergency Management  
E-mail: [jennings.kim@epa.gov](mailto:jennings.kim@epa.gov) || Desk: (202) 564-7998 ||

4-25-2018 1:31

# Non-Responsive

**From:** Tekrony, Linda  
**Sent:** Wednesday, April 25, 2018 1:31 PM  
**To:** Hans, Mick; Mayhugh, Robert  
**Cc:** Connell, Rebecca  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

Take as much time as you need.

---

**From:** Hans, Mick  
**Sent:** Wednesday, April 25, 2018 12:30 PM  
**To:** Tekrony, Linda <Tekrony.Linda@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Cc:** Connell, Rebecca <Connell.Rebecca@epa.gov>  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

Thanks, Linda. We'll discuss internally. There's some new things to think about you that have (quite reasonably) raised. Can we take a week or two to sort out and check-in with HQ OEM?

NEIC is clearly further along in strictly adapting the new guidelines than we are in R5 CEPPS.

Mick Hans  
Chief  
R5 SFD-ERB1-CEPPS

---

**From:** Tekrony, Linda  
**Sent:** Wednesday, April 25, 2018 12:30 PM  
**To:** Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Cc:** Hans, Mick <hans.mick@epa.gov>; Connell, Rebecca <Connell.Rebecca@epa.gov>  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

If the region would prefer to push this inspection into FY19, the inspection report will need to meet the 60 day report timeframe that is required on all inspection reports. In order for NEIC to implement the 60 day timeframe, we have modified our procedures in how we conduct the inspection report writing process. In this case, since the facility already knows we are coming, we will request as many documents prior to conducting the inspection as we can. These documents will be reviewed prior to the inspection, which will make our onsite time more efficient and the report writing process more efficient. We will not be requesting additional documents from the facility after we have left the site, but we will incorporate any documents gathered while onsite into the inspection report. NEIC will not be producing preliminary findings after the onsite inspection; we will be working on drafting the report. The draft report will exclude anything claimed as CBI by the facility and any CBI content will be provided in an appendix. And finally, the region will not have an opportunity to comment on a draft report. NEIC will produce an inspection report in 60 days that is considered a final inspection report.

If you are okay with this proposal, it looks like the majority of the first quarter is available to schedule the inspection. Please let me know how the region would to proceed.

---

**From:** Mayhugh, Robert  
**Sent:** Wednesday, April 25, 2018 10:51 AM  
**To:** Tekrony, Linda <Tekrony.Linda@epa.gov>

**Cc:** Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)>

**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

Hi Linda,

Sorry for not getting back sooner, I've been out the last couple of weeks. In talking with Mick I expressed my concern that pushing the inspection back to August may be getting a little late on our schedule. It may, at this time be best to look to postpone to FY 19 if that works for you.

Bob

---

**From:** Tekrony, Linda

**Sent:** Thursday, April 12, 2018 9:45 AM

**To:** Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)>; Mayhugh, Robert <[mayhugh.robert@epa.gov](mailto:mayhugh.robert@epa.gov)>

**Subject:** Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

The NEIC team has checked our schedules and I would like to propose the week of August 20 for rescheduling of the Husky Energy 112r inspection. With all of the other commitments that we have made and summer vacation schedules, this is the only week we have available before September 14. Please let me know if this will work for the two of you.

Linda Tekrony

Criminal Services Section Chief, Field Branch

EPA-NEIC

Office (303) 462-9259

Cell (720) 415-9624

4-25-2018 1:30 PM

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Wednesday, April 25, 2018 1:30 PM  
**To:** Tekrony, Linda; Mayhugh, Robert  
**Cc:** Connell, Rebecca  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

Thanks, Linda. We'll discuss internally. There's some new things to think about you that have (quite reasonably) raised. Can we take a week or two to sort out and check-in with HQ OEM?

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Mick Hans  
Chief  
R5 SFD-ERB1-CEPPS

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**Cc:** Hans, Mick <hans.mick@epa.gov>; Connell, Rebecca <Connell.Rebecca@epa.gov>  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

If the region would prefer to push this inspection into FY19, the inspection report will need to meet the 60 day report timeframe that is required on all inspection reports. In order for NEIC to implement the 60 day timeframe, we have modified our procedures in how we conduct the inspection report writing process. In this case, since the facility already knows we are coming, we will request as many documents prior to conducting the inspection as we can. These documents will be reviewed prior to the inspection, which will make our onsite time more efficient and the report writing process more efficient. We will not be requesting additional documents from the facility after we have left the site, but we will incorporate any documents gathered while onsite into the inspection report. NEIC will not be producing preliminary findings after the onsite inspection; we will be working on drafting the report. The draft report will exclude anything claimed as CBI by the facility and any CBI content will be provided in an appendix. And finally, the region will not have an opportunity to comment on a draft report. NEIC will produce an inspection report in 60 days that is considered a final inspection report.

If you are okay with this proposal, it looks like the majority of the first quarter is available to schedule the inspection. Please let me know how the region would to proceed.

---

**From:** Mayhugh, Robert  
**Sent:** Wednesday, April 25, 2018 10:51 AM  
**To:** Tekrony, Linda <Tekrony.Linda@epa.gov>  
**Cc:** Hans, Mick <hans.mick@epa.gov>  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

Hi Linda,

Sorry for not getting back sooner, I've been out the last couple of weeks. In talking with Mick I expressed my concern that pushing the inspection back to August may be getting a little late on our schedule. It may, at this time be best to look to postpone to FY 19 if that works for you.

Bob

---

**From:** Tekrony, Linda

**Sent:** Thursday, April 12, 2018 9:45 AM

**To:** Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)>; Mayhugh, Robert <[mayhugh.robert@epa.gov](mailto:mayhugh.robert@epa.gov)>

**Subject:** Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

The NEIC team has checked our schedules and I would like to propose the week of August 20 for rescheduling of the Husky Energy 112r inspection. With all of the other commitments that we have made and summer vacation schedules, this is the only week we have available before September 14. Please let me know if this will work for the two of you.

Linda TeKrony

Criminal Services Section Chief, Field Branch

EPA-NEIC

Office (303) 462-9259

Cell (720) 415-9624

4-25-18 12:30

## Non-Responsive

**From:** Tekrony, Linda  
**Sent:** Wednesday, April 25, 2018 12:30 PM  
**To:** Mayhugh, Robert  
**Cc:** Hans, Mick; Connell, Rebecca  
**Subject:** RE: Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

If the region would prefer to push this inspection into FY19, the inspection report will need to meet the 60 day report timeframe that is required on all inspection reports. In order for NEIC to implement the 60 day timeframe, we have modified our procedures in how we conduct the inspection report writing process. In this case, since the facility already knows we are coming, we will request as many documents prior to conducting the inspection as we can. These documents will be reviewed prior to the inspection, which will make our onsite time more efficient and the report writing process more efficient. We will not be requesting additional documents from the facility after we have left the site, but we will incorporate any documents gathered while onsite into the inspection report. NEIC will not be producing preliminary findings after the onsite inspection; we will be working on drafting the report. The draft report will exclude anything claimed as CBI by the facility and any CBI content will be provided in an appendix. And finally, the region will not have an opportunity to comment on a draft report. NEIC will produce an inspection report in 60 days that is considered a final inspection report.

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Bob

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**To:** Hans, Mick <hans.mick@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Subject:** Rescheduling of Husky Energy Superior Refinery (Calumet Superior Refinery)

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Linda TeKrony  
Criminal Services Section Chief, Field Branch  
EPA-NEIC

Office (303) 462-9259  
Cell (720) 415-9624

3-2018

## YOUR TRIP TO:

3500 Tower Ave, Superior, WI, 54880-5335

mapquest

6 MIN | 3.4 MI 

Est. fuel cost: \$0.33

Trip time based on traffic conditions as of 9:11 AM on March 7,  
2018. Current Traffic: Light



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1. Start out going **southwest** on Stinson Ave toward Hill Ave.

Then 1.33 miles 1.33 total miles



2. Turn **slight right** onto N 55th St.

*N 55th St is just past Baxter Ave.*

*If you are on Stinson Ave and reach Cumming Ave you've gone a little too far.*

Then 0.10 miles 1.43 total miles



3. Take the 3rd **right** onto Hammond Ave.

*Hammond Ave is just past N 54th St.*

*If you reach Hughitt Ave you've gone a little too far.*

Then 0.75 miles 2.18 total miles



4. Hammond Ave becomes N 46th St.

Then 0.28 miles 2.46 total miles



5. Turn **right** onto Tower Ave/WI-35.

*If you are on Henry Cohen Dr and reach N 42nd St you've gone about 0.4 miles too far.*

Then 0.94 miles 3.40 total miles

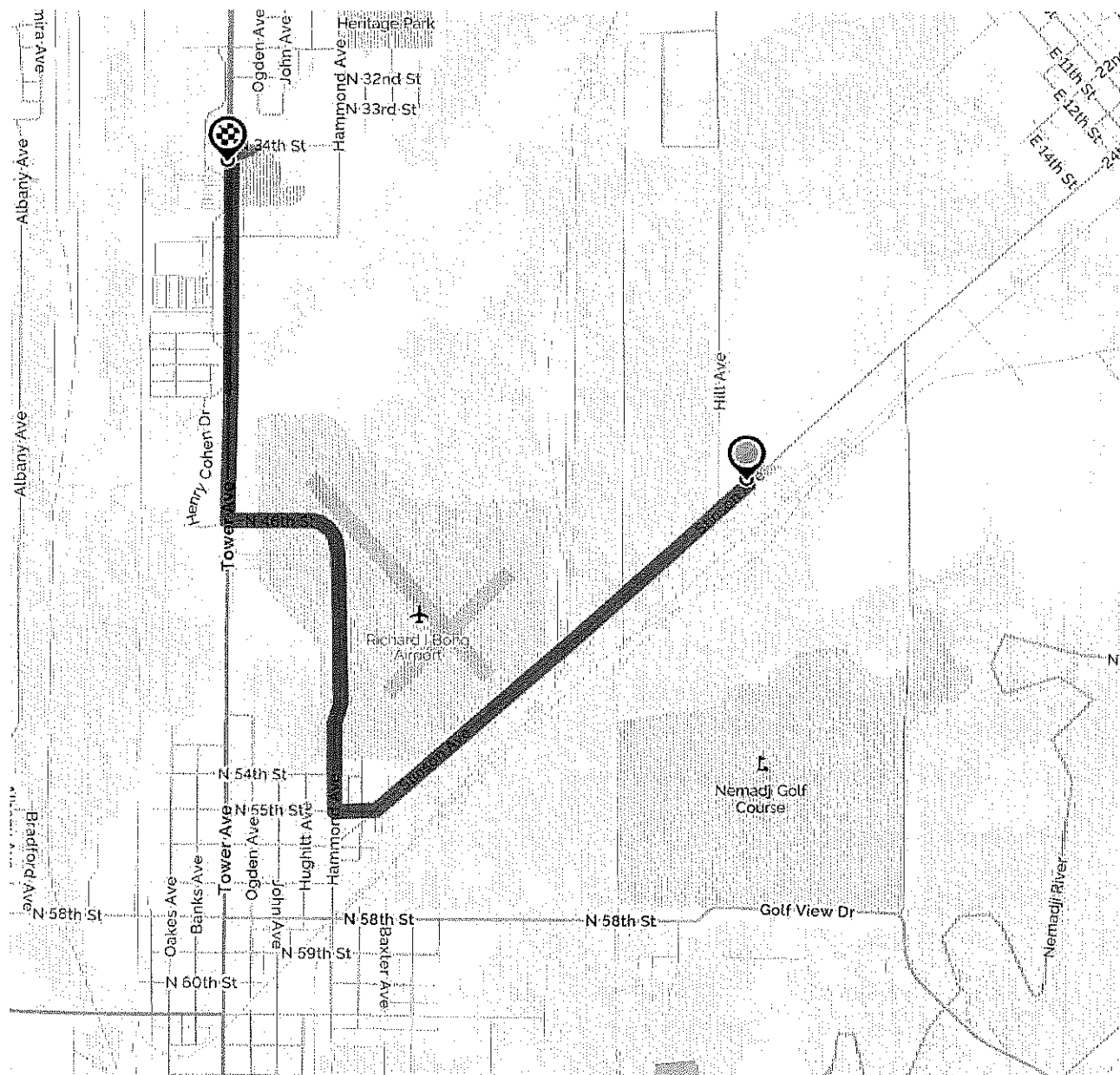


6. 3500 Tower Ave, Superior, WI 54880-5335, 3500 TOWER AVE is on the left.

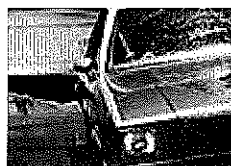
*Your destination is 0.1 miles past N 37th St.*

*If you reach N 34th St you've gone a little too far.*

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**(1-888-461-3625)**

2-7-18

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Wednesday, February 7, 2018 11:57 AM  
**To:** Tekrony, Linda  
**Cc:** Mayhugh, Robert; El-Zein, Jason; Borries, Samuel; Triantafillou, Kathy  
**Subject:** April 2018: RE: Clean Air Act 112r Inspection at Calumet Superior Refinery

Linda,

This e-mail confirms we're Go to proceed in R5. I just spoke to Acting SFD Director Bob Kaplan, who is A-OK with the inspection.

Along with advance notice to the facility per usual, in the spirit of Cooperative Federalism please be sure WDNR is made aware of the inspection and has the opportunity to attend or be briefed. Bob Mayhugh will lead on interacting with the State per NEIC protocols.

Mick Hans  
Chief  
SFD-ERB1-CEPPS

---

**From:** Tekrony, Linda  
**Sent:** Thursday, February 01, 2018 8:47 AM  
**To:** Mayhugh, Robert <[mayhugh.robert@epa.gov](mailto:mayhugh.robert@epa.gov)>; Hans, Mick <[hans.mick@epa.gov](mailto:hans.mick@epa.gov)>  
**Subject:** Clean Air Act 112r Inspection at Calumet Superior Refinery

I have been identified as the NEIC project manager for the Calumet Superior Refinery Clean Air Act 112r inspection Region 5 requested last summer. I am reaching out to make sure that you all still want NEIC to conduct this inspection and to inform you of our current plans.

We currently have the inspection scheduled for the week of April 16. If inspectors from the region would like to join, we welcome their participation.

Please let me know if the region still wants NEIC to conduct this inspection, and if the week we have selected of April 16 works for you all.

I look forward to working with you both on this project.

Linda Tekrony  
Civil Services Section Chief, Field Branch  
EPA-NEIC  
(303) 462-9259

2-1-18

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Thursday, February 1, 2018 8:52 AM  
**To:** Tekrony, Linda; Mayhugh, Robert  
**Cc:** El-Zein, Jason  
**Subject:** RE: Clean Air Act 112r Inspection at Calumet Superior Refinery

Thanks, Linda.

Bob Mayhugh, who will accompany and is our CAA 112r lead in Wisconsin, has been down with flu this week. And our RA and new SF Division Directors are just settling in.

I think we're Go as discussed, but I want to reconfirm everything internally and get back to you next week.

Mick Hans  
Chief  
R5 SFD-ERB1-CEPPS

---

**From:** Tekrony, Linda  
**Sent:** Thursday, February 01, 2018 8:47 AM  
**To:** Mayhugh, Robert <mayhugh.robert@epa.gov>; Hans, Mick <hans.mick@epa.gov>  
**Subject:** Clean Air Act 112r Inspection at Calumet Superior Refinery

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I look forward to working with you both on this project.

Linda TeKrony  
Civil Services Section Chief, Field Branch  
EPA-NEIC  
(303) 462-9259

2-1-18

## Non-Responsive

**From:** Tekrony, Linda  
**Sent:** Thursday, February 1, 2018 8:47 AM  
**To:** Mayhugh, Robert; Hans, Mick  
**Subject:** Clean Air Act 112r Inspection at Calumet Superior Refinery

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Linda Tekrony  
Civil Services Section Chief, Field Branch  
EPA-NEIC  
(303) 462-9259

9-21-17

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Thursday, September 21, 2017 2:50 PM  
**To:** Bezerra, Joana; Bolin, Jane; Boomhower, Alice; Chomycia, Greg; Chrzaszcz, Monika; Entzminger, James; Greaves, William; Hans, Mick; Jager, Ginger; Mayhugh, Robert; Palomo, Silvia; Peoples, Richard; Riley, Ellen; Zhang, Xiaomi  
**Cc:** El-Zein, Jason; Borries, Samuel  
**Subject:** FW: NEIC FY 18 Request for Civil Enforcement Support  
**Attachments:** FY18 List of NEIC Civil Requests.pdf

FYI. The Calumet Superior (WI) Refinery in Wisconsin made the NEIC list for a FY18 CAA 112r inspection. Bob Mayhugh will be lead on this.

This is the second time CEPPS has been on the NEIC list, following the Dow Chemical CAA 112r inspection earlier this year. Greg Chomycia accompanied NEIC on that one, stepping in when Monika Chrzaszcz was on maternity leave.

Mick

---

**From:** Canzler, Erica  
**Sent:** Thursday, September 21, 2017 10:47 AM  
**To:** Enforcement Coordinators <Enforcement\_Coordinators@epa.gov>; Enforcement Division Directors <Enforcement\_Division\_Directors@epa.gov>; Bahk, Benjamin <Bahk.Benjamin@epa.gov>; Belser, Evan <Belser.Evan@epa.gov>; Brooks, Phillip <Brooks.Phillip@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>; Denton, Loren <Denton.Loren@epa.gov>; Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>; Fried, Gregory <Fried.Gregory@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Lott, Don <Lott.Don@epa.gov>; McCray, Deborah <McCray.Deborah@epa.gov>; Miles, James <miles.james@epa.gov>; Pollins, Mark <Pollins.Mark@epa.gov>; Porter, Amy <Porter.Amy@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Schefski, Melissa <Schefski.Melissa@epa.gov>; Shinkman, Susan <Shinkman.Susan@epa.gov>; Stedeford, Todd <Stedeford.Todd@epa.gov>; Stewart, Andrew <Stewart.Andrew@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Theis, Joseph <Theis.Joseph@epa.gov>; Trivedi, Adrienne <Trivedi.Adrienne@epa.gov>; Werner, Jacqueline <Werner.Jacqueline@epa.gov>; Barrette, Michael <Barrette.Michael@epa.gov>; Carbone, Chad <Carbone.Chad@epa.gov>; Dombrowski, John <Dombrowski.John@epa.gov>; Duffy, Rick <Duffy.Rick@epa.gov>; Hill, Randy <Hill.Randy@epa.gov>; Hindin, David <Hindin.David@epa.gov>; Hobus, Cindy <hobus.cindy@epa.gov>; Holic, Daniel <Holic.Daniel@epa.gov>; Hufford, Steve <Hufford.Steve@epa.gov>; Knopes, Christopher <Knopes.Christopher@epa.gov>; Liem, Francisca <Liem.Francisca@epa.gov>; Lund, Lisa <Lund.Lisa@epa.gov>; Mason, Michael <Mason.Michael@epa.gov>; McKeever, Michele <McKeever.Michele@epa.gov>; Meredith, David <Meredith.David@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Miller, Mamie <Miller.Mamie@epa.gov>; Palmer, Daniel <Palmer.Daniel@epa.gov>; Segall, Martha <Segall.Martha@epa.gov>; Vizard, Elizabeth <Vizard.Elizabeth@epa.gov>; Walker, Mike <Walker.Mike@epa.gov>; Wallace, Jane <wallace.jane@epa.gov>; Wingard, Phyllis <Wingard.Phyllis@epa.gov>; Dart, Denny <Dart.Denny@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; Papetti, Lisa <papetti.lisa@epa.gov>; LaPosta, Dore <LaPosta.Dore@epa.gov>; McGarry, Barbara <McGarry.Barbara@epa.gov>; Floto, Erin <Floto.Erin@epa.gov>; Henry, JeannaR <Henry.Jeannar@epa.gov>; Maldonado, Zelma <Maldonado.Zelma@epa.gov>; Isin, Amelie <Isin.Amelie@epa.gov>; hagedorn, james <hagedorn.james@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Weeks, Victor <weeks.victor@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>; Paulin, Jamie <paulin.jamie@epa.gov>; Scambiaterra, Graciela <scambiaterra.graciela@epa.gov>; Whitney, Brenda <whitney.brenda@epa.gov>; Morris, Julie <morris.julie@epa.gov>; Hans, Mick <hans.mick@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>; Triantafillou, Kathy <triantafillou.kathy@epa.gov>; Kuefler, Patrick

<kuefler.patrick@epa.gov>; Middleton, Keith <middleton.keith@epa.gov>; Sharrow, Diane <sharrow.diane@epa.gov>; Francis, Walt <francis.walt@epa.gov>; Elkins, Timothy <elkins.timothy@epa.gov>; Greenhagen, Andrew <Greenhagen.Andrew@epa.gov>; Jann, Stephen <jann.stephen@epa.gov>; Peters, Carol <Peters.Carol@epa.gov>; Matthews, Rachel <Matthews.Rachel@epa.gov>; Saunders, Jerry <Saunders.Jerry@epa.gov>; Ford, Debbie <Ford.Debbie@epa.gov>; Chen, Justin <Chen.Justin@epa.gov>; Werner, Leslye <Werner.Leslye@epa.gov>; Terriquez, Joe <terriquez.joe@epa.gov>; Goetz, Mary <goetz.mary@epa.gov>; Wenner, Rebecca <wenner.rebecca@epa.gov>; Cobb, David <cobb.david@epa.gov>; Ramirez, Steven A <ramirez.stevena@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; Urdiales, Aaron <Urdiales.Aaron@epa.gov>; Schafer, Cynthia <Schafer.Cynthia@epa.gov>; DeJong, Stephanie <DeJong.Stephanie@epa.gov>; Llamozas, Emilio <Llamozas.Emilio@epa.gov>; Boeglin, Michael <Boeglin.Michael@epa.gov>; Tokarz, Christine <tokarz.christine@epa.gov>; Bailey, Treasure <Bailey.Treasure@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; ADAMS, CONNOR <Adams.Connor@epa.gov>; McDaniel, Doug <McDaniel.Doug@epa.gov>; Schofield, John <Schofield.John@epa.gov>; Lin, Sharon <Lin.Sharon@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Williams, Christopher <Williams.Christopher@epa.gov>; Barrette, Michael <Barrette.Michael@epa.gov>; Elson, Lance <Elson.Lance@epa.gov>; Palmer, Daniel <Palmer.Daniel@epa.gov>; Tuxbury, Courtney <Tuxbury.Courtney@epa.gov>; Hindin, David <Hindin.David@epa.gov>; Wasem, Russell <Wasem.Russell@epa.gov>; Vizard, Elizabeth <Vizard.Elizabeth@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Ripp, Thomas <Ripp.Tom@epa.gov>; Carbone, Chad <Carbone.Chad@epa.gov>; Culver, Edison <culver.edison@epa.gov>; Krausz, Brian <Krausz.Brian@epa.gov>; Heminway, Seth <Heminway.Seth@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Miles, James <miles.james@epa.gov>; Trivedi, Adrienne <Trivedi.Adrienne@epa.gov>; Crossland, Andy <Crossland.Andy@epa.gov>; Bellot, Michael <Bellot.Michael@epa.gov>; Babor, Peter <Babor.Peter@epa.gov>

**Cc:** Barnet, Henry <Barnet.Henry@epa.gov>; Mazakas, Pam <Mazakas.Pam@epa.gov>; Cavanaugh, Charles <Cavanaugh.Charles@epa.gov>

**Subject:** RE: NEIC FY 18 Request for Civil Enforcement Support

I am pleased to share the list of Civil projects that NEIC has proposed to accept for FY 2018. You will find this list attached as a PDF file to this email, and it includes proposed time frames for each project.

You will note that NEIC has received a substantial number of requests (66) for Civil project support in FY 2018. Please be aware that we have carefully considered each request that was submitted and that the decisions concerning which projects to accept have been very difficult in light of the high quality and number of requests which were received. Where possible, we have tried to place the projects we accepted in the time frames that you requested. However, we were not successful in every instance. We appreciate your understanding in this matter and will be glad to discuss any individual project further if you so desire.

In order to better serve you and to provide high quality work products, I want clarify that we need the following information ninety (90) days prior to the scheduled inspection in order to allow for adequate planning: clearly defined issues, objectives and scope; any documents necessary to define project scope; and a list of State, Regional and/or Headquarters contacts. If these criteria cannot be met, NEIC may look to substitute another project in that time slot.

I would ask that each of the Regional Enforcement Coordinators and Headquarters contacts work with all involved parties in their offices to determine if the proposed list of projects and schedules are acceptable. **Please let Matt Schneider know by September 29, 2017 if you have any comments concerning the list of proposed projects.** Your responses will be used to develop a final schedule and a list of NEIC Project Managers for each approved project that will be shared with you by October 6, 2017.

We value our relationship with each of you and look forward to supporting your Civil Enforcement Program in FY 2018. Please feel free to contact myself or Matt Schneider if you have any questions concerning these selections.

Erica Cänzler  
Director, National Enforcement Investigations Center  
Office of Criminal Enforcement, Forensics, and Training  
U.S. EPA

(o) 303-462-9003

(c) 202-431-3146

[canzler.eric@epa.gov](mailto:canzler.eric@epa.gov)

9-21-17

## Non-Responsive

**From:** Canzler, Erica  
**Sent:** Thursday, September 21, 2017 10:47 AM  
**To:** Enforcement Coordinators; Enforcement Division Directors; Bahk, Benjamin; Belser, Evan; Brooks, Phillip; Chapman, Apple; Crossland, Andy; Denton, Loren; Fogarty, Johnpc; Fried, Gregory; Kelley, Rosemarie; Lott, Don; McCray, Deborah; Miles, James; Pollins, Mark; Porter, Amy; Saenz, Diana; Schefski, Melissa; Shinkman, Susan; Stedeford, Todd; Stewart, Andrew; Sullivan, Greg; Theis, Joseph; Trivedi, Adrienne; Werner, Jacqueline; Barrette, Michael; Carbone, Chad; Dombrowski, John; Duffy, Rick; Hill, Randy; Hindin, David; Hobus, Cindy; Holic, Daniel; Hufford, Steve; Knopes, Christopher; Liem, Francisca; Lund, Lisa; Mason, Michael; Mckeever, Michele; Meredith, David; Messina, Edward; Miller, Mamie; Palmer, Daniel; Segall, Martha; Vizard, Elizabeth; Walker, Mike; Wallace, Jane; Wingard, Phyllis; Dart, Denny; O'Donnell, Mary Jane; Papetti, Lisa; LaPosta, Dore; McGarry, Barbara; Floto, Erin; Henry, JeannaR; Maldonado, Zelma; Isin, Amelie; Hagedorn, James; Bookman, Robert; Weeks, Victor; Russo, Todd; Radford, Nicole; Paulin, Jamie; Scambiaterra, Graciela; Whitney, Brenda; Morris, Julie; Hans, Mick; Mayhugh, Robert; Triantafillou, Kathy; Kuefler, Patrick; Middleton, Keith; Sharrow, Diane; Francis, Walt; Elkins, Timothy; Greenhagen, Andrew; Jann, Stephen; Peters, Carol; Matthews, Rachel; Saunders, Jerry; Ford, Debbie; Chen, Justin; Werner, Leslye; Terriquez, Joe; Goetz, Mary; Wenner, Rebecca; Cobb, David; Ramirez, Steven A; North, Alexis; Patefield, Scott; Urdiales, Aaron; Schafer, Cynthia; DeJong, Stephanie; Llamozas, Emilio; Boeglin, Michael; Tokarz, Christine; Bailey, Treasure; Lawrence, Kathryn; ADAMS, CONNOR; McDaniel, Doug; Schofield, John; Lin, Sharon; McClintock, Katie; Williams, Christopher; Barrette, Michael; Elson, Lance; Palmer, Daniel; Tuxbury, Courtney; Hindin, David; Wasem, Russell; Vizard, Elizabeth; Mia, Marcia; Ripp, Thomas; Carbone, Chad; Culver, Edison; Krausz, Brian; Heminway, Seth; Sullivan, Greg; Miles, James; Trivedi, Adrienne; Crossland, Andy; Bellot, Michael; Babor, Peter  
**Cc:** Barnet, Henry; Mazakas, Pam; Cavanaugh, Charles  
**Subject:** RE: NEIC FY 18 Request for Civil Enforcement Support  
**Attachments:** FY18 List of NEIC Civil Requests.pdf

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Erica Canzler  
Director, National Enforcement Investigations Center  
Office of Criminal Enforcement, Forensics, and Training  
U.S. EPA  
(o) 303-462-9003  
(c) 202-431-3146  
canzler.eric@epa.gov

7.25.17

## Non-Responsive

**From:** Anderson, Andrew  
**Sent:** Tuesday, July 25, 2017 7:34 AM  
**To:** Hans, Mick; Mayhugh, Robert  
**Cc:** Triantafillou, Kathy  
**Subject:** RE: NEIC FY 18 Request for Civil Enforcement Support

Kathy T. will be coordinating a R5 response to NEIC.

Thanks.

Andrew Anderson  
Deputy Director  
Office of Enforcement and  
Compliance Assurance  
Region 5, EPA  
(312) 353-9681

---

**From:** Hans, Mick  
**Sent:** Monday, July 24, 2017 2:30 PM  
**To:** Mayhugh, Robert <mayhugh.robert@epa.gov>  
**Cc:** Anderson, Andrew <anderson.andrew@epa.gov>  
**Subject:** FW: NEIC FY 18 Request for Civil Enforcement Support

Bob,

Per below please fill out a form for the possible NEIC Wisconsin CAA 112r inspection we have discussed previously.

Andy,

FYI that CEPPS anticipates one for the R5 list—similar to the Dow inspection in FY17. Will you be coordinating this or should we just provide directly to NEIC?

Thanks.

Mick

---

**From:** Tekrony, Linda  
**Sent:** Wednesday, July 19, 2017 7:51 AM  
**To:** Robinson, Janis <Robinson.Janis@epa.gov>; Rochlin, David <Rochlin.David@epa.gov>; Weiner, Marc <Weiner.Marc@epa.gov>; Bazley, Greg <Bazley.Greg@epa.gov>; Berg, Elizabeth <Berg.Elizabeth@epa.gov>; BERMAN, TESSA <Berman.Tessa@epa.gov>; Deyoe, Jeremy <deyoe.jeremy@epa.gov>; Gallo, Madeline <Gallo.Madeline@epa.gov>; Henry, Karen <Henry.Karen@EPA.GOV>; Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>; Jones, bill <jones.bill@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Lucas, Robert <Lucas.Robert@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>; Nixon, Donald <Nixon.Donald@epa.gov>; Proboszcz, Angie <Proboszcz.Angie@EPA.GOV>; Rongone, Marie <Rongone.Marie@epa.gov>; Steiner, Cyntia <Steiner.Cyntia@epa.gov>; Wirschafter, Joshua <Wirschafter.Joshua@epa.gov>; Averbach, Jonathan

<Averback.Jonathan@epa.gov>; Belke, Jim <Belke.Jim@epa.gov>; Bosecker, Elizabeth <Bosecker.Elizabeth@epa.gov>; Brown, Stephanie <Brown.Stephanie@epa.gov>; Burnett, Michael <Burnett.Michael@epa.gov>; Dixon, Chelsea <Dixon.Chelsea@epa.gov>; Franklin, Kathy <Franklin.Kathy@epa.gov>; Garvey, Mark <Garvey.Mark@epa.gov>; Gerardin, Margaret <Gerardin.Margaret@epa.gov>; Gioffre, Patricia <Gioffre.Patricia@epa.gov>; Hunt, Stuart <Hunt.Stuart@epa.gov>; Jacob, Sicy <Jacob.Sicy@epa.gov>; Jennings, Kim <Jennings.Kim@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Mears, Gilbert <Mears.Gilbert@epa.gov>; Miles, James <miles.james@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Santacroce, Jeffrey <Santacroce.Jeffrey@epa.gov>; Seltzer, Mark <Seltzer.Mark@epa.gov>; Skinner-Thompson, Jonathan <Skinner-Thompson.Jonathan@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Swenson, Erik <Swenson.Erik@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Varco, Joseph <varco.joseph@epa.gov>; Yonce, Stacey <yonce.stacey@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Devkota, Om <devkota.om@epa.gov>; Reed, Lori <Reed.Lori@epa.gov>; Brown, Deborah <Brown.Deborah@epa.gov>; Chin, William <chin.bill@epa.gov>; Gaffey, Jim <Gaffey.Jim@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; Peavey, Dwight <Peavey.Dwight@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Smith, Catherine <smith.catherine@epa.gov>; Wallace, Leonard <Wallace.Len@epa.gov>; Gallagher, Shirin <Gallagher.Shirin@epa.gov>; Garcia, Terry <Garcia.Terry@epa.gov>; Hales, Bob <Hales.Bob@epa.gov>; Hartman, Bob <Hartman.Bob@epa.gov>; Leefers, Kristin <Leefers.Kristin@epa.gov>; LeGreid, Kathleen <LeGreid.Kathleen@epa.gov>; Magdangal, David <magdangal.david@epa.gov>; Mairs, Stephanie <Mairs.Stephanie@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Meinhardt, Danielle <meinhardt.danielle@epa.gov>; Morales, Javier <Morales.Javier@epa.gov>; Phillips, Peter <Phillips.Peter@epa.gov>; Vergeront, Julie <Vergeront.Julie@epa.gov>; Williams, Erin <Williams.Erin@epa.gov>; Banner, Ellen <Banner.Ellen@epa.gov>; Dholakia, Umesh <Dholakia.Umesh@epa.gov>; Ghaffari, Mozafar <Ghaffari.Mozafar@epa.gov>; Harrington, Dwayne <Harrington.Dwayne@epa.gov>; Leung, Chao <Leung.Chao@epa.gov>; Maimone, Francesco <Maimone.Francesco@epa.gov>; Mosher, Eric <Mosher.Eric@epa.gov>; Ouedraogo, Idrissa <ouedraogo.idrissa@epa.gov>; Petty, Joel <petty.joel@epa.gov>; Regna, Jean <Regna.Jean@epa.gov>; Rivera, Carlos <Rivera.Carlos@epa.gov>; Rodriguez, Nancy <Rodriguez.Nancy@epa.gov>; Armstrong, Joan <Armstrong.Joan@epa.gov>; Baginski, Alfred <Baginski.Alfred@epa.gov>; Beckley, Patrick <Beckley.Patrick@epa.gov>; Daniel, Kevin <Daniel.Kevin@epa.gov>; Dunn, Michael <dunn.michael@epa.gov>; Gallagher, Theresa <gallagher.theresa@epa.gov>; Garcia, Jefferie <Garcia.Jefferie@epa.gov>; Gardner, Allison <Gardner.Allison@epa.gov>; Gilley, Anne <Gilley.anne@epa.gov>; Hunt, Mary <Hunt.Mary@epa.gov>; Nilsen, Ashley <Nilsen.Ashley@epa.gov>; pandya, perry <pandya.perry@epa.gov>; Parent, Suzanne <Parent.Suzanne@epa.gov>; VanOrden, James <VanOrden.James@epa.gov>; Weiss, Cynthia <Weiss.Cynthia@epa.gov>; Welsh, Mike <Welsh.Mike@epa.gov>; Ziegler, Lauren <Ziegler.Lauren@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Caplan, Robert W. <Caplan.Robert@epa.gov>; Chow, Eddie <Chow.Eddie@epa.gov>; Cobb, Brandon <cobb.brandon@epa.gov>; Crum, Lynda <Crum.Lynda@epa.gov>; Fite, Mark <Fite.Mark@epa.gov>; Grant, Deanne <Grant.Deanne@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Juan, Rodolfo <Juan.Rodolfo@epa.gov>; Kono, Michiko <Kono.Michiko@epa.gov>; Noles, Jordan <Noles.Jordan@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>; Platt, Kerry <Platt.Kerry@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Refuge, Danielle <Refuge.Danielle@epa.gov>; Rouch, Ellen <Rouch.Ellen@epa.gov>; Rubini, Suzanne <Rubini.Suzanne@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Spagg, Beverly <Spagg.Beverly@epa.gov>; Toney, Anthony <Toney.Anthony@epa.gov>; Warrilow, Phyllis <Warrilow.Phyllis@epa.gov>; Weeks, Victor <weeks.victor@epa.gov>; White, Erika <White.Erika@epa.gov>; Bezerra, Joana <bezerra.joana@epa.gov>; Chomycia, Greg <chomycia.greg@epa.gov>; Chrzaszcz, Monika <chrzaszcz.monika@epa.gov>; Entzminger, James <entzminger.james@epa.gov>; Hans, Mick <hans.mick@epa.gov>; Jager, Ginger <jager.ginger@epa.gov>; Kaiser, Steven <kaiser.steven@epa.gov>; Mayhugh, Robert <mayhugh.robert@epa.gov>; McNamara, Ruth <mcnamara.ruth@epa.gov>; Moore, Cecilia <moore.cecilia@epa.gov>; Palomo, Silvia <palomo.silvia@epa.gov>; Riley, Ellen <riley.ellen@epa.gov>; Smith, Robert H <smith.roberth@epa.gov>; Wagner, William <wagner.william@epa.gov>; Barra, Michael <barra.michael@epa.gov>; Clay, Jeffrey <clay.jeffrey@epa.gov>; Ford, Debbie <Ford.Debbie@epa.gov>; Foster, Althea <Foster.Althea@epa.gov>; Hodges, Angela <Hodges.Angela@epa.gov>; Howard, AshleyA <Howard.AshleyA@epa.gov>; Mason, Steve <mason.steve@epa.gov>; Moore, Nathaniel <Moore.Nathaniel@epa.gov>; Murdock, James <Murdock.James@epa.gov>; Pearson, Evan <Pearson.Evan@epa.gov>; Phelps, Sherronda <Phelps.Sherronda@epa.gov>; Robledo, Tony <Robledo.Tony@epa.gov>; Rogers, Elizabeth

<rogers.elizabeth@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>; Smith, Monica <smith.monica@epa.gov>; Stucky, Marie <Stucky.Marie@epa.gov>; Tates, Samuel <Tates.Samuel@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>; Trawick, Matthew <Trawick.Matthew@epa.gov>; Ward, Misty <ward.misty@epa.gov>; Bieri, Britt <bieri.britt@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bosch, Raymond <Bosch.Raymond@epa.gov>; Brewer, Laura <brewer.laura@epa.gov>; Bunch, Howard <Bunch.Howard@epa.gov>; Harper, Jodi <Harper.Jodi@epa.gov>; Hayes, Scott <Hayes.Scott@epa.gov>; Hensley, Dave <Hensley.Dave@epa.gov>; Hoard, Christine <Hoard.Christine@epa.gov>; LaBoda, Sarah <LaBoda.Sarah@epa.gov>; Mills, Clarissa <mills.clarissa@epa.gov>; Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; Pessetto, Jared <Pessetto.Jared@epa.gov>; Reitz, Patricia <Reitz.Patricia@epa.gov>; Rosado-Chaparro, Wilfredo <Rosado-Chaparro.Wilfredo@epa.gov>; Stotts, Krystal <Stotts.Krystal@epa.gov>; Trotter, Jennifer <Trotter.Jennifer@epa.gov>; Weekley, Erin <weekley.erin@epa.gov>; Whisnant, Amber <Whisnant.Amber@epa.gov>; Atencio, Kathie <Atencio.Kathie@epa.gov>; Bockstahler, Breann <Bockstahler.breann@epa.gov>; Broussard, Rebecca <Broussard.Rebecca@epa.gov>; Chavez, Luke <Chavez.Luke@epa.gov>; Cobb, David <cobb.david@epa.gov>; Frishman, Bob <Frishman.Bob@epa.gov>; Meyer, Jeff <Meyer.Jeff@epa.gov>; Ramirez, Steven A <ramirez.stevena@epa.gov>

**Subject:** NEIC FY 18 Request for Civil Enforcement Support

NEIC is sending out our request for civil enforcement support for FY18. Please find attached our menu of services and our fillable form for requesting projects. If you have any questions, please feel free to email or call me. We look forward to working with you!

Linda TeKrony  
EPA-NEIC  
(303) 462-9259

#### **MEMORANDUM**

**SUBJECT:** Fiscal Year 2018 Request for Civil Enforcement Support

**FROM:** Erica M. Canzler, Director, National Enforcement Investigation Center

**TO:** Regional Enforcement Coordinators and Directors

Office of Civil Enforcement (OCE) Office Director, Deputy Office Director, and Division Directors  
Office of Compliance (OC) Office Director, Deputy Office Director, and Division Directors

I am pleased to announce the National Enforcement Investigation Center's (NEIC's) fiscal year (FY) 2018 civil project solicitation process. Continuing with our ongoing practice, this is the opportunity for Regional and Headquarters offices to propose facility candidates for inspections/investigations in the coming FY, or to request other types of civil enforcement support. While not a comprehensive listing, the attached NEIC "Menu of Services" illustrates many of the activities and services that NEIC can perform for your program, such as conducting process-based and/or multi-media investigations; developing field approaches for new regulations; performing laboratory analyses; and deploying advanced monitoring instrumentation as part of field work. As always, we look forward to working with you on projects that support National and Regional Enforcement Initiatives, and which are expected to produce significant pollution reductions and injunctive relief.

For each requested project, please complete the attached *Civil Enforcement Support Request Form*. Please note that providing as much background information and detail as possible is encouraged; projects with fully developed rationales and compelling environmental insult explanations will fare better in the evaluation process. We are asking that each Region/Office provide one integrated request to David Gwisdalla (listed below), with all candidates listed in priority order, by August 14, 2017. A preliminary list of approved projects, including proposed schedules, will be issued

September 13, 2017, for review and comment, and a final list of projects and schedules will be forwarded October 6, 2017.

We look forward to working with you and your staff to achieve maximum environmental and public health benefits through effective use of our collective resources. To facilitate ongoing dialogue, we will be establishing media-specific points of contact for each Regional and Headquarters office to promote continuing discussions on targeting, results, and changes in our portfolio of offerings. We will be distributing information on your point(s) of contact in FY 2018.

Thank you in advance for working with us to plan for a successful FY 2018. David Gwisdalla, the NEIC Field Branch Chief will serve as NEIC's point of contact for developing the list of projects and can be reached at 303.462.9307, or [gwisdalla.david@epa.gov](mailto:gwisdalla.david@epa.gov). Additionally, please do not hesitate to reach out to me with any questions or concerns.

Attachments: Menu of Services; Civil Enforcement Support Request Form

Erica Canzler  
Director, National Enforcement Investigations Center  
Office of Criminal Enforcement, Forensics, and Training  
U.S. EPA  
(o) 303-462-9003  
(c) 202-431-3146  
[canzler.eric@epa.gov](mailto:canzler.eric@epa.gov)

7-24-2017

## Non-Responsive

**From:** Hans, Mick  
**Sent:** Monday, July 24, 2017 2:30 PM  
**To:** Mayhugh, Robert  
**Cc:** Anderson, Andrew  
**Subject:** FW: NEIC FY 18 Request for Civil Enforcement Support  
**Attachments:** 2018 NEIC Menu of Services.pdf; NEIC FY18 Civil Enforcement Support Request Form.docx; NEIC FY18 Request for Projects.pdf

Bob,

Per below please fill out a form for the possible NEIC Wisconsin CAA 112r inspection we have discussed previously.

Andy,

FYI that CEPPS anticipates one for the R5 list—similar to the Dow inspection in FY17. Will you be coordinating this or should we just provide directly to NEIC?

Thanks.

Mick

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**From:** Tekrony, Linda  
**Sent:** Wednesday, July 19, 2017 7:51 AM  
**To:** Robinson, Janis <Robinson.Janis@epa.gov>; Rochlin, David <Rochlin.David@epa.gov>; Weiner, Marc <Weiner.Marc@epa.gov>; Bazley, Greg <Bazley.Greg@epa.gov>; Berg, Elizabeth <Berg.Elizabeth@epa.gov>; BERMAN, TESSA <Berman.Tessa@epa.gov>; Deyoe, Jeremy <deyoe.jeremy@epa.gov>; Gallo, Madeline <Gallo.Madeline@epa.gov>; Henry, Karen <Henry.Karen@EPA.GOV>; Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>; jones, bill <jones.bill@epa.gov>; Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>; Lucas, Robert <Lucas.Robert@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>; Nixon, Donald <Nixon.Donald@epa.gov>; Proboszcz, Angie <Proboszcz.Angie@EPA.GOV>; Rongone, Marie <Rongone.Marie@epa.gov>; Steiner, Cyntia <Steiner.Cyntia@epa.gov>; Wirtschafter, Joshua <Wirtschafter.Joshua@epa.gov>; Averback, Jonathan <Averback.Jonathan@epa.gov>; Belke, Jim <Belke.Jim@epa.gov>; Bosecker, Elizabeth <Bosecker.Elizabeth@epa.gov>; Brown, Stephanie <Brown.Stephanie@epa.gov>; Burnett, Michael <Burnett.Michael@epa.gov>; Dixon, Chelsea <Dixon.Chelsea@epa.gov>; Franklin, Kathy <Franklin.Kathy@epa.gov>; Garvey, Mark <Garvey.Mark@epa.gov>; Gerardin, Margaret <Gerardin.Margaret@epa.gov>; Gioffre, Patricia <Gioffre.Patricia@epa.gov>; Hunt, Stuart <Hunt.Stuart@epa.gov>; Jacob, Sicy <Jacob.Sicy@epa.gov>; Jennings, Kim <Jennings.Kim@epa.gov>; Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Mears, Gilbert <Mears.Gilbert@epa.gov>; Miles, James <miles.james@epa.gov>; Presler, Amos <presler.amos@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Santacroce, Jeffrey <Santacroce.Jeffrey@epa.gov>; Seltzer, Mark <Seltzer.Mark@epa.gov>; Skinner-Thompson, Jonathan <Skinner-Thompson.Jonathan@epa.gov>; Sullivan, Greg <Sullivan.Greg@epa.gov>; Swenson, Erik <Swenson.Erik@epa.gov>; Tekrony, Linda <Tekrony.Linda@epa.gov>; Varco, Joseph <varco.joseph@epa.gov>; Yonce, Stacey <yonce.stacey@epa.gov>; Ziegel, Dean <Ziegel.Dean@epa.gov>; Devkota, Om <devkota.om@epa.gov>; Reed, Lori <Reed.Lori@epa.gov>; Brown, Deborah <Brown.Deborah@epa.gov>; Chin, William <chin.bill@epa.gov>; Gaffey, Jim <Gaffey.Jim@epa.gov>; O'Donnell, Mary Jane <Odonnell.Maryjane@epa.gov>; Peavey, Dwight <Peavey.Dwight@epa.gov>; Rascher, Chris <rascher.chris@epa.gov>; Smith, Catherine <smith.catherine@epa.gov>; Wallace, Leonard <Wallace.Len@epa.gov>; Gallagher, Shirin <Gallagher.Shirin@epa.gov>; Garcia, Terry <Garcia.Terry@epa.gov>; Hales, Bob <Hales.Bob@epa.gov>; Hartman, Bob <Hartman.Bob@epa.gov>; Leefers, Kristin <Leefers.Kristin@epa.gov>; LeG Reid, Kathleen <LeG Reid.Kathleen@epa.gov>; Magdangal, David

<magdangal.david@epa.gov>; Mairs, Stephanie <Mairs.Stephanie@epa.gov>; McFadden, Kelly  
 <McFadden.Kelly@epa.gov>; Meinhardt, Danielle <meinhardt.danielle@epa.gov>; Morales, Javier  
 <Morales.Javier@epa.gov>; Phillips, Peter <Phillips.Peter@epa.gov>; Vergeront, Julie <Vergeront.Julie@epa.gov>;  
 Williams, Erin <Williams.Erin@epa.gov>; Banner, Ellen <Banner.Ellen@epa.gov>; Dholakia, Umesh  
 <Dholakia.Umesh@epa.gov>; Ghaffari, Mozafar <Ghaffari.Mozafar@epa.gov>; Harrington, Dwayne  
 <Harrington.Dwayne@epa.gov>; Leung, Chao <Leung.Chao@epa.gov>; Maimone, Francesco  
 <Maimone.Francesco@epa.gov>; Mosher, Eric <Mosher.Eric@epa.gov>; Ouedraogo, Idrissa  
 <ouedraogo.idrissa@epa.gov>; Petty, Joel <petty.joel@epa.gov>; Regna, Jean <Regna.Jean@epa.gov>; Rivera, Carlos  
 <Rivera.Carlos@epa.gov>; Rodriguez, Nancy <Rodriguez.Nancy@epa.gov>; Armstrong, Joan  
 <Armstrong.Joan@epa.gov>; Baginski, Alfred <Baginski.Alfred@epa.gov>; Beckley, Patrick <Beckley.Patrick@epa.gov>;  
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 pandya, perry <pandya.perry@epa.gov>; Parent, Suzanne <Parent.Suzanne@epa.gov>; VanOrden, James  
 <VanOrden.James@epa.gov>; Weiss, Cynthia <Weiss.Cynthia@epa.gov>; Welsh, Mike <Welsh.Mike@epa.gov>; Ziegler,  
 Lauren <Ziegler.Lauren@epa.gov>; Bookman, Robert <Bookman.Robert@epa.gov>; Caplan, Robert W.  
 <Caplan.Robert@epa.gov>; Chow, Eddie <Chow.Eddie@epa.gov>; Cobb, Brandon <cobb.brandon@epa.gov>; Crum,  
 Lynda <Crum.Lynda@epa.gov>; Fite, Mark <Fite.Mark@epa.gov>; Grant, Deanne <Grant.Deanne@epa.gov>;  
 Groendyke, Todd <Groendyke.Todd@epa.gov>; Juan, Rodolfo <Juan.Rodolfo@epa.gov>; Kono, Michiko  
 <Kono.Michiko@epa.gov>; Noles, Jordan <Noles.Jordan@epa.gov>; Nowell, Valerie <Nowell.Valerie@epa.gov>; Platt,  
 Kerry <Platt.Kerry@epa.gov>; Poole, Vinson <Poole.Vinson@epa.gov>; Refuge, Danielle <Refuge.Danielle@epa.gov>;  
 Rouch, Ellen <Rouch.Ellen@epa.gov>; Rubini, Suzanne <Rubini.Suzanne@epa.gov>; Russo, Todd  
 <Russo.Todd@epa.gov>; Spagg, Beverly <Spagg.Beverly@epa.gov>; Toney, Anthony <Toney.Anthony@epa.gov>;  
 Warrilow, Phyllis <Warrilow.Phyllis@epa.gov>; Weeks, Victor <weeks.victor@epa.gov>; White, Erika  
 <White.Erika@epa.gov>; Bezerra, Joana <bezerra.joana@epa.gov>; Chomycia, Greg <chomycia.greg@epa.gov>;  
 Chrzaszcz, Monika <chrzaszcz.monika@epa.gov>; Entzminger, James <entzminger.james@epa.gov>; Hans, Mick  
 <hans.mick@epa.gov>; Jager, Ginger <jager.ginger@epa.gov>; Kaiser, Steven <kaiser.steven@epa.gov>; Mayhugh,  
 Robert <mayhugh.robert@epa.gov>; McNamara, Ruth <mcnamara.ruth@epa.gov>; Moore, Cecilia  
 <moore.cecilia@epa.gov>; Palomo, Silvia <palomo.silvia@epa.gov>; Riley, Ellen <riley.ellen@epa.gov>; Smith, Robert H  
 <smith.roberth@epa.gov>; Wagner, William <wagner.william@epa.gov>; Barra, Michael <barra.michael@epa.gov>;  
 Clay, Jeffrey <clay.jeffrey@epa.gov>; Ford, Debbie <Ford.Debbie@epa.gov>; Foster, Althea <Foster.Althea@epa.gov>;  
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 <Phelps.Sherronda@epa.gov>; Robledo, Tony <Robledo.Tony@epa.gov>; Rogers, Elizabeth  
 <rogers.elizabeth@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>; Smith, Monica <smith.monica@epa.gov>;  
 Stucky, Marie <Stucky.Marie@epa.gov>; Tate, Samuel <Tate.Samuel@epa.gov>; Thompson, Steve  
 <thompson.steve@epa.gov>; Trawick, Matthew <Trawick.Matthew@epa.gov>; Ward, Misty <ward.misty@epa.gov>;  
 Bieri, Britt <bieri.britt@epa.gov>; Blunk, Terri <Blunk.Terri@epa.gov>; Bosch, Raymond <Bosch.Raymond@epa.gov>;  
 Brewer, Laura <brewer.laura@epa.gov>; Bunch, Howard <Bunch.Howard@epa.gov>; Harper, Jodi  
 <Harper.Jodi@epa.gov>; Hayes, Scott <Hayes.Scott@epa.gov>; Hensley, Dave <Hensley.Dave@epa.gov>; Hoard,  
 Christine <Hoard.Christine@epa.gov>; LaBoda, Sarah <LaBoda.Sarah@epa.gov>; Mills, Clarissa <mills.clarissa@epa.gov>;  
 Ndiaye, Fatimatou <Ndiaye.Fatimatou@epa.gov>; Pessetto, Jared <Pessetto.Jared@epa.gov>; Reitz, Patricia  
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**Subject:** NEIC FY 18 Request for Civil Enforcement Support

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Linda TeKrony  
EPA-NEIC  
(303) 462-9259

**MEMORANDUM**

**SUBJECT:** Fiscal Year 2018 Request for Civil Enforcement Support

**FROM:** Erica M. Canzler, Director, National Enforcement Investigation Center

**TO:** Regional Enforcement Coordinators and Directors

Office of Civil Enforcement (OCE) Office Director, Deputy Office Director, and Division Directors  
Office of Compliance (OC) Office Director, Deputy Office Director, and Division Directors

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Erica Canzler  
Director, National Enforcement Investigations Center

Office of Criminal Enforcement, Forensics, and Training

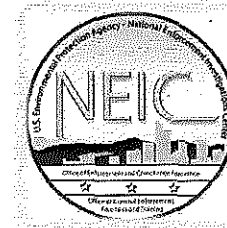
U.S. EPA

(o) 303-462-9003

(c) 202-431-3146

[canzler.eric@epa.gov](mailto:canzler.eric@epa.gov)

# National Enforcement Investigations Center (NEIC) Menu of Services



- Civil and criminal investigations, field measurements, sampling, and laboratory support
- Process-based industrial facility investigations (single and multi-media)
- Sampling and analysis to support investigation observations (examples: CWT, TSDF, and hazardous waste incinerators)
- Strategic planning from national perspective (examples: mining, energy extraction, CWT, refineries, and TSDF)
- Expert services, consultation, reports, testimony, field sampling plans, etc.
- Specialized laboratory support services for Regional projects

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## WATER

- Industrial dischargers
- Centralized waste treatment (CWT)
- Energy extraction
- Mining
- Pretreatment
- Wastewater treatment plant analysis, assessment, and modeling
- Municipal infrastructure/wet weather (CSO/SSO)
- Safe Drinking Water Act (SDWA)

## RCRA

- Surface impoundments
- Air emission regulations (RCRA); Subparts AA/BB/CC
- Facilities that treat waste to meet land disposal restrictions (LDRs)
- Carbon regeneration facilities
- Hazardous waste recycling facilities
- Treatment storage and/or disposal facility (TSDF)

## EPCRA

- Toxic release inventory (TRI) (§313)
- Spill report review

## AIR

- Energy extraction
- National emissions standards for hazardous air pollutants (NESHAP) rules (Parts 61 and 63)
- New source performance standards (NSPS) regulations
- Major source applicability for maximum achievable control technology (MACT) sources
- Refinery consent decree follow-up
- Leak detection and repair (LDAR) comparative monitoring
- Electronic data review (LDAR, COMs, CMS, and CEMs)
- Optical gas imaging survey
- GMAP, SPODs, and diffusion tubes
- Air toxics sampling and analysis
- CAA 112R

## APPLICATIONS TRAINING

- Training with in-field consultation
- Process-based investigations
- CAA/RCRA – AA/BB/CC
- RCRA Refinery
- RCRA/CWT
- RCRA LDR
- Surface Impoundments



## LABORATORY

- Evaluation of solid or liquid waste to determine compliance with RCRA, CWA, and CAA
- Asbestos analysis
- Determination of type, amount, and source of contaminants in soil
- Pesticide analysis
- RCRA characteristic testing
- Determination of composition and potential source of abandoned waste
- Analysis to determine compliance with land disposal restriction treatment standards
- Analysis of wastewater and environmental water samples for chemical content
- Ozone depleting chemicals analysis
- PCB analysis
- Identification of pharmaceuticals/personal care products
- Identification of unknown substances
- Expert services, consultations, reports, testimony
- Analysis of air toxics – passive diffusion tubes and canisters

## OTHER EXPERTISE

- Toxicology support
- Statistical and electronic data analysis
- Source attribution assessments
- USDA soils certified



## FY18 Civil Enforcement Support Request Form



<b>Requesting Office:</b> EPA Region: <a href="#">Choose an item.</a> or Headquarters: <a href="#">Click here to enter text.</a>	<b>Date:</b> <a href="#">Click here to enter a date.</a>
<b>Name of requestor(s):</b> <a href="#">Click here to enter text.</a>	<b>Assigned Point of Contact:</b> <a href="#">Click here to enter text.</a>
<b>Name of facility or project:</b> <a href="#">Click here to enter text.</a>	<b>Location of Facility (City/State):</b> <a href="#">Click here to enter text.</a>
<b>For which regulation (or portion thereof) do you want NEIC to determine compliance?</b> <a href="#">Click here to enter text.</a>	
<b>Applicable permit information (permit numbers, etc.):</b> <a href="#">Click here to enter text.</a>	
<b>Is this request related to an existing National Enforcement Initiative (NEI)?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> If so, which one: <a href="#">Click here to enter text.</a>	
<b>Is this request a priority for a State and/or other Agency?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> If so, please list all: <a href="#">Click here to enter text.</a>	
<b>For delegated programs, do you have or expect to have State support for this project?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> If not, please describe why: <a href="#">Click here to enter text.</a>	
<b>Please describe the scope of the requested inspection:</b> <a href="#">Click here to enter text.</a>	
<b>Are there any current or on-going enforcement actions at this facility/location?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> If so, please explain: <a href="#">Click here to enter text.</a>	
<b>What are the specific goals &amp; objectives for this request? (Include expectations for analysis and/or deliverables)</b> <a href="#">Click here to enter text.</a>	
<b>Do you anticipate sampling and/or analysis? If so, please specify the contaminants of concern.</b> <a href="#">Click here to enter text.</a>	
<b>Requested timing of this inspection:</b> <a href="#">Click here to enter text.</a>	
<b>Any other information that you wish to share: (Please use back of form if additional space is needed)</b> <a href="#">Click here to enter text.</a>	



# FY18 Civil Enforcement Support Request Form



Any other information that you wish to share.

[Click here to enter text.](#)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF CRIMINAL ENFORCEMENT, FORENSICS AND TRAINING  
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER  
P.O. BOX 25227, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

July 17, 2017

**MEMORANDUM**

**SUBJECT:** Fiscal Year 2018 Request for Civil Enforcement Support

**FROM:** Erica M. Canzler, Director, National Enforcement Investigation Center

*Erica Canzler*

**TO:** Regional Enforcement Coordinators and Directors  
Office of Civil Enforcement (OCE) Office Director, Deputy Office Director, and  
Division Directors  
Office of Compliance (OC) Office Director, Deputy Office Director, and Division Directors

I am pleased to announce the National Enforcement Investigation Center's (NEIC's) fiscal year (FY) 2018 civil project solicitation process. Continuing with our ongoing practice, this is the opportunity for Regional and Headquarters offices to propose facility candidates for inspections/investigations in the coming FY, or to request other types of civil enforcement support. While not a comprehensive listing, the attached NEIC "Menu of Services" illustrates many of the activities and services that NEIC can perform for your program, such as conducting process-based and/or multi-media investigations; developing field approaches for new regulations; performing laboratory analyses; and deploying advanced monitoring instrumentation as part of field work. As always, we look forward to working with you on projects that support National and Regional Enforcement Initiatives, and which are expected to produce significant pollution reductions and injunctive relief.

For each requested project, please complete the attached *Civil Enforcement Support Request Form*. Please note that providing as much background information and detail as possible is encouraged; projects with fully developed rationales and compelling environmental insult explanations will fare better in the evaluation process. We are asking that each Region/Office provide one integrated request to David Gwisdalla (listed below), with all candidates listed in priority order, by August 14, 2017. A preliminary list of approved projects, including proposed schedules, will be issued September 13, 2017, for review and comment, and a final list of projects and schedules will be forwarded October 6, 2017.

We look forward to working with you and your staff to achieve maximum environmental and public health benefits through effective use of our collective resources. To facilitate ongoing dialogue, we will be establishing media-specific points of contact for each Regional and Headquarters office to promote continuing discussions on targeting, results, and changes in our portfolio of offerings. We will be distributing information on your point(s) of contact in FY 2018.

Thank you in advance for working with us to plan for a successful FY 2018. David Gwisdalla, the NEIC Field Branch Chief will serve as NEIC's point of contact for developing the list of projects and can be reached at 303.462.9307, or [gwisdalla.david@epa.gov](mailto:gwisdalla.david@epa.gov). Additionally, please do not hesitate to reach out to me with any questions or concerns.

Attachments: Menu of Services; Civil Enforcement Support Request Form

# Non-Responsive

**From:** Mayhugh, Robert  
**Sent:** Wednesday, August 9, 2017 9:04 AM  
**To:** Hans, Mick  
**Subject:** NEIC  
**Attachments:** NEIC FY18 Civil Enforcement Support Request Form.docx

Here is the request. See if it looks ok to you.